

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

Eugene Westmoreland,	)	
	)	
Plaintiff,	)	No.: 23-cv-1851
	)	
v.	)	
	)	Hon. Jeffrey T. Gilbert
Cook County Sheriff Thomas Dart, et al.	)	
	)	
Defendants.	)	
	)	

**DEFENDANTS' SECOND AGREED MOTION FOR EXTENSION OF TIME  
FOR BRIEFING OF DISPOSITIVE MOTIONS**

NOW COME Defendants COOK COUNTY SHERIFF THOMAS DART, and COOK COUNTY, a body politic and corporate, by and through their attorneys, Jason E. DeVore and Zachary G. Stillman, of DeVore Radunsky LLC, pursuant to Fed. R. Civ. P. 6(b), and for Defendants' Second Agreed Motion for Extension of Time for Briefing of Dispositive Motions, state as follows:

1. Counsels for all parties have been in communication regarding this Motion and are in agreement as to the requested extension.
2. This is the second requested extension to the dispositive motion deadlines in this matter.
3. The parties filed a first Agreed Motion for Extension of Time for Briefing of Dispositive Motions with this Court on October 9, 2024. (ECF No. 93.)
4. Thereafter, on October 10, 2024, this Court granted such extension, ordering Dispositive Motions due by December 2, 2024, Responses due by January 10, 2025, and Replies due by January 23, 2024. (ECF No. 94.)
5. Both Plaintiff and Defendants have now agreed that they still need additional time to draft any dispositive motions at present because of their schedules, as well as the

preference of the parties to wait and potentially give the Court time rule on Plaintiff's Motions for Class Certification, and for Permanent Injunctive Relief.

6. Accordingly, the parties now request a 45 (forty-five) day extension to all deadlines, up to and including the following dates: Dispositive Motions due by January 15, 2025; Responses due by February 24, 2025; and Replies due by March 10, 2025.
7. Under Rule 6(b), this Court may, for good cause, extend the time "[w]hen an act may or must be done." Fed. R. Civ. P. 6(b).
8. Not granting the requested extensions of time would prejudice the parties because the current deadlines will not allow sufficient time to properly prepare and submit their briefs.
9. The extension will grant the parties sufficient time to prepare their briefs, as well as allow the Court more time to potentially rule on the aforementioned pending Motions, the results of which could strongly impact both parties' arguments at this dispositive stage.
10. Granting an extension of time will not prejudice any party and this motion is not brought for undue delay or any improper purpose.

WHEREFORE, Defendants respectfully request that this Honorable Court enter an order as follows:

1. The Agreed Motion for Extension of Time is granted;
2. Dispositive Motions due by January 15, 2025; Responses due by February 24, 2025; and Replies due by March 10, 2025; and
3. Any other such relief as this court deems reasonable and just.

Respectfully Submitted,

**Defendants**

By: /s/ Zachary G. Stillman  
Zachary G. Stillman, One of the  
Attorneys for Defendants

**DEVORE RADUNSKY LLC**

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that the above **Second Agreed Motion for Extension of Time** was filed on November 6, 2024, with the Northern District of Illinois ECF System, serving a copy to all parties.

/s/Zachary Stillman

Zachary Stillman